

SEALED

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

August 7, 2020

KAREN MITCHELL
CLERK, U.S. DISTRICT COURT

United States of America
v.

DAMIEN WILLIAMS

Case No.

3:20-MJ-

3:20-MJ-821-BT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 20, 2020 through July, 28 2020 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 1594(a), 1591
(a) & (b)(2)

Attempted Child Sex Trafficking

This criminal complaint is based on these facts:

See the attached affidavit.

☒ Continued on the attached sheet.

James Cutbirth

Complainant's signature

James Cutbirth, SA HSI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: 8/7/2020

REBECCA RUTHERFORD

Judge's signature

City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, James Cutbirth, a Special Agent with U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security, ICE/HSI, in Dallas, Texas assigned to the North Texas Trafficking Task Force (NTTTF). I have been a criminal investigator for approximately four years. I have received training from the Federal Law Enforcement Training Center (FLETC) and have been the lead investigator for various investigations across multiple disciplines including, but not limited to, human trafficking. As a law enforcement officer, I have used a variety of methods to investigate criminal activity including, but not limited to, visual surveillance, witness interviews, the use of search warrants, confidential informants, and undercover agents. I have been the Affiant for and have participated in the execution of numerous search warrants and arrest warrants.

2. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents/officers within HSI and the NTTTF. The information contained in this affidavit is based on my personal knowledge, information I received from other law enforcement agents assisting in this investigation, and what I have learned from the other sources specifically discussed herein. Because this affidavit is being

submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation.

3. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that between June 20, 2020 and July 28, 2020 in the Dallas Division of the Northern District of Texas and elsewhere, **Damien WILLIAMS** committed the offense of Attempted Child Sex Trafficking in violation of 18 U.S.C. §§ 1594(a), 1591(a) & (b)(2).

PROBABLE CAUSE

4. HSI Special Agents currently assigned to the NTTTF initiated a proactive operation targeting human traffickers who exploit social media websites to recruit juvenile victims to engage in commercial sex acts.

5. Between June 20, 2020, and July 28, 2020, **Damien WILLIAMS** engaged with HSI undercover agents (UCAs) representing themselves as a juvenile female. **WILLIAMS** communicated with the UCAs utilizing cellular telephone number 678-531-3278 and via social media “Website A”¹ utilizing username “**KING DAME_16**.”

POSITIVE IDENTIFICATION OF WILLIAMS

6. **WILLIAMS** utilized username “**KING DAME_16**” on Website A to communicate with an UCA. The account page associated with the username “**KING DAME_16**” contained multiple photographs depicting **WILLIAMS**. Special Agents

¹ I know the name of the social media platform Website A, but in the interest of protecting ongoing investigations involving this website I do not list it here.

compared photographs from Website A with those drawn from Department of Motor Vehicles databases. Special Agents confirmed a positive match.



COMMUNICATIONS BETWEEN WILLIAMS AND UCAs

7. Communications between **WILLIAMS** and the UCAs have been summarized and organized below for clarity. All definitions and interpretations are based on my training and experience as a law enforcement agent.

8. On June 20, 2020, **WILLIAMS** initiated communications with the UCA. The following is a summary of the communications conducted via a messaging application within Website A and does not include every word exchanged.

Participant Name	Date	Message
WILLIAMS	6/20/2020	Hey lil momma
UCA	6/20/2020	Who's this
WILLIAMS	6/22/2020	A new friend
UCA	6/22/2020	I ain't lookin 4 friends but I am guessin ur a pimp
WILLIAMS	6/22/2020	Ur a smart girl
WILLIAMS	6/22/2020	But ion want u to get the misconception that the rest of the world has about the p ²
UCA	6/22/2020	I been wit Ps b4
WILLIAMS	6/22/2020	That's wats up...So wats ur situation now lil momma
UCA	6/22/2020	li'm talkin 2 a couple Ps and deciding wut I want 2 do
WILLIAMS	6/22/2020	Dig that...I hope u make the right choice. 678-531-3278 Cincinnati Redd
UCA	6/22/2020	Where u from tho
WILLIAMS	6/22/2020	The name tells u where I'm from...M in Chattanooga Tennessee right now

After **WILLIAMS** initiated conversation, the UCA informed **WILLIAMS**, “*I ain't lookin for friends but I am guessin ur a pimp.*” **WILLIAMS** confirmed when he replied, “*Ur a smart girl.*” After the UCA informed **WILLIAMS** that he/she worked for pimps

² “P” is a common abbreviation used in the human trafficking subculture to refer to a Pimp

in the past, **WILLIAMS** asked the UCA about his/her current situation. The UCA informed **WILLIAMS** that he/she was currently talking to other pimps before deciding. **WILLIAMS** replied, “*Dig that...I hope u make the right choice.*” **WILLIAMS** then gave the UCA his moniker “*Cincinnati Red,*” his phone number (678) 531-3278, and identified his location as Chattanooga, Tennessee. **WILLIAMS** acknowledged the UCA previously engaged in the sale of commercial sex under the authority of another pimp and encouraged the UCA to “*make the right choice*” by joining his human trafficking organization (HTO).

9. Between June 22, 2020 and June 23, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	6/22/2020	Do this for me. Send me three recent pics. One face n 2 full body, front n back
WILLIAMS	6/22/2020	I got a question, well I got a lot of questions, but this one can decide whether the other ones even need to be asked...
WILLIAMS	6/22/2020	Do u fell a P should get his money soley from a bitch that he pimpin on or does he have several avenues that bring cash in?
UCA	6/22/2020	I don't care how he get his money if I'm livin good

WILLIAMS	6/22/2020	Perfect answer
WILLIAMS	6/22/2020	I knew u were a smart girl
UCA	6/22/2020	You out on the blade tho? ³
WILLIAMS	6/22/2020	When it's a blade to be on...Chattanooga more ads. Lotta bored tricks ⁴ wit cash
WILLIAMS	6/22/2020	So how long u been renegading? ⁵
UCA	6/22/2020	I don't renegade
UCA	6/22/2020	I only worked when I had a P
WILLIAMS	6/22/2020	So u not working now?
UCA	6/22/2020	No I just ended it with a P a couple weeks ago
WILLIAMS	6/22/2020	Say lil momma...Ain't no need in dragging ya feet, the choice is clear...I'm right here...It's time to put them big girl panties on n let's get back at it. Ya dig...

In this exchange, **WILLIAMS** asked the UCA to send him photos of him/her and then asked the UCA *"Do u fell a P should get his money soley from a bitch that he pimpin on or does he have several avenues that bring cash in?"* This question was posed by **WILLIAMS** to test the UCA to make sure he/she understood **WILLIAMS'** dominance

³ "Blade" is a common term within the human trafficking subculture used to refer to an area where women walk to display themselves while selling commercial sex. This is commonly along a road.

⁴ "Tricks" is a common term within the human trafficking subculture used to refer to commercial sex customers.

⁵ "Renegade" is a common term within the human trafficking subculture used to refer to a prostitute who engages in commercial sex acts who is not under the authority of a pimp.

over victims within his HTO. The UCA's response passed **WILLIAMS'** test.

WILLIAMS then sent several memes containing captions about pimping and loyalty.

WILLIAMS asked the UCA if he/she was "*renegading*." **WILLIAMS** asked the UCA if he/she was currently engaged in the sale of commercial sex. The UCA told him he/she was not, and **WILLIAMS** replied, "*Ain't no need in dragging ya feet, the choice is clear...I'm right here...It's time to put them big girl panties on n let's get back at it. Ya dig...*" **WILLIAMS** offered to instruct the UCA in re-entering the commercial sex industry and encouraged him/her to join his HTO.

10. On June 23, 2020, the UCA responded to **WILLIAMS'**s request. The following is a summary of the communications from June 23, 2020 through July 1, 2020 and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	6/23/2020	Wuts ur fee ⁶
WILLIAMS	6/23/2020	Based on the fact that u seem like a real go-getta...1500 won't be shit to a real boss bitch like u right.
WILLIAMS	6/23/2020	678-531-3278
UCA	6/23/2020	I think I could get that
WILLIAMS	6/23/2020	I know u can

⁶ "Fee" is a common term within the human trafficking subculture used to refer to a "choosing fee." This fee is paid by human trafficking victims to their trafficker or pimp to join their human trafficking organization.

WILLIAMS	6/23/2020	U say u had a couple P's u were talking to...I'm just tryna c where I'm at in this race to aquire the prize which is u
WILLIAMS	6/24/2020	Hit my line lil baby...I'm bout to log off here
WILLIAMS	6/24/2020	678-531-3278
WILLIAMS	6/25/2020	Damn...I must have come in second or third place. Still ain't heard a word from u lil baby
WILLIAMS	6/30/2020	Say there
UCA	7/1/2020	What's up?
WILLIAMS	7/1/2020	U never gonna use that number huh
UCA	7/1/2020	I will text u
WILLIAMS	7/1/2020	678-531-3278

In this exchange, the UCA asked **WILLIAMS** what the fee was to join his HTO.

WILLIAMS stated that his fee would be \$1,500.00 and then provided the same phone number, 678-531-3278. Between June 24, 2020 through July 1, 2020, **WILLIAMS** initiated conversations with the UCA in order to recruit him/her to join his HTO.

WILLIAMS questioned the UCA several times as to why he had not heard from him/her. After **WILLIAMS** made multiple attempts to engage the UCA, the UCA agreed to speak to **WILLIAMS** via text message with the number he provided, 678-531-3278.

TEXT MESSAGES EXCHANGED OVER CELLULAR NETWORK

11. On July 1, 2020 **WILLIAMS** and the UCA continued to communicate via text messages from cellular telephone number 678-531-3278. The text messages exchanged were sent by **WILLIAMS** to an HSI recorded telephone number. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/2/2020	So u have folks ⁷ or nah
UCA	7/2/2020	Nah im done wit him
UCA	7/2/2020	So how much u gonna charge for the fee
WILLIAMS	7/2/2020	1500...But u can make mine here
WILLIAMS	7/2/2020	How old r u
UCA	7/2/2020	16 almost 17
WILLIAMS	7/2/2020	Lord haff mercy
WILLIAMS	7/2/2020	U tryna send me to jail
UCA	7/2/2020	If u can post the ads i will try to get some car dates ⁸
WILLIAMS	7/2/2020	Send me sum pics

WILLIAMS asked the UCA again whether he/she had a pimp. The UCA confirmed

⁷ “Folks” is a common term within the human trafficking subculture used to refer to HTO members including both traffickers and victims.

⁸ “Car dates” are a common term within the human trafficking subculture to refer to when a prostitute completes a commercial sex act inside a vehicle.

he/she was not working under the authority of a pimp. The UCA asked **WILLIAMS** again how much he is going to charge for his fee. **WILLIAMS** responded that the fee was \$1,500.00 but told the UCA he/she could “*earn*” the fee when he/she met **WILLIAMS**. **WILLIAMS** asked the UCA his/her age is and the UCA replied “*16 almost 17.*” **WILLIAMS** acknowledged the UCA’s status as a juvenile and knowledge that his intentions were against the law when he replied “*Lord haff mercy U tryna send me to jail.*” The UCA told **WILLIAMS** that he/she would respond to customers when **WILLIAMS** posted a commercial sex advertisement on the internet. **WILLIAMS** acknowledged and told the UCA to “*Send me some pics.*”

POSTING OF COMMERCIAL SEX ADVERTISEMENT BY WILLIAMS

12. On July 6, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the text communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/6/2020	I need a number and an area to put in this ad
UCA	7/6/2020	214-935-3820
WILLIAMS	7/6/2020	http://dallas.skipthegames.com/female-escorts/caucasian_w/car-play/418044476871
WILLIAMS	7/6/2020	I need u to stay in constant contact with me
WILLIAMS	7/6/2020	Errytime u bout to go on a date u text me

WILLIAMS	7/6/2020	Quick visit (15 mins) 75-80 Half hour 125-150 Hour 200-250 ⁹
WILLIAMS	7/6/2020	Let me know when u get responses

WILLIAMS asked the UCA for his/her phone number to link to the commercial sex advertisement. The UCA provided **WILLIAMS** with an HSI recorded telephone number, 214-935-3820. **WILLIAMS** sent the UCA the hyperlink directing him/her to the commercial sex advertisement he posted on the commercial sex website www.skipthegames.com. **WILLIAMS** demonstrated his authority over the UCA when he instructed him/her *“to stay in constant contact with me”* and *“Errytime u bout to go on a date u text me.”* **WILLIAMS** instructed the UCA to charge commercial sex customers \$75.00 to \$80.00 for a quick visit, \$125.00-\$150.00 for a half an hour, and \$200.00-\$250.00 for a full hour. **WILLIAMS** told the UCA *“Let me know when u get responses.”*

CONTINUED COMMUNICATIONS BETWEEN WILLIAMS AND UCAs

13. On July 6, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
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⁹ “Quick visit” is a common term in the human trafficking subculture to refer to a commercial sex act in which the customer only stays long enough to ejaculate and leaves immediately afterwards

WILLIAMS	7/6/2020	How much u have now
UCA	7/6/2020	700
WILLIAMS	7/6/2020	Take a pic n send it to me
WILLIAMS	7/6/2020	Yeah babes. When u gonna send that money
WILLIAMS	7/6/2020	...Do western union with a test question 2 separate transactions....300 each. Hold the rest to have some bread to handle ur business
WILLIAMS	7/6/2020	Name: Damien Williams Send to: Chattanooga Tennessee Test Question: whats my daddy ¹⁰ name? King Dame

In this exchange, **WILLIAMS** asked the UCA how much he/she had earned in commercial sex proceeds. The UCA told **WILLIAMS** he/she had earned seven hundred dollars. **WILLIAMS** asked the UCA for photographic proof of the commercial sex proceeds earned. **WILLIAMS** instructed the UCA to send the commercial sex proceeds to him through a money transfer service. **WILLIAMS** instructed the UCA to send \$300.00 in two separate transactions. **WILLIAMS** told the UCA that he/she could keep one hundred dollars. **WILLIAMS** told the UCA to transfer the commercial sex proceeds to “*Damien Williams*” in “*Chattanooga Tennessee*” and use the test question “*whats my daddy name?*” with the answer of “*King Dame.*”

¹⁰ “Daddy” is a common term in the human trafficking subculture used to refer to a pimp or trafficker.

14. On July 7, 2020 and continuing through July 8, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/7/2020	U cant make up an excuse to go to a Walgreens or Walmart...U gonna b in and out
WILLIAMS	7/7/2020	Ur not playing with my time n energy are u lil momma
WILLIAMS	7/7/2020	Not really showing the effort im expecting out of my bottom bitch ¹¹
WILLIAMS	7/8/2020	U gonna have to do western union
WILLIAMS	7/8/2020	Use my name
WILLIAMS	7/8/2020	With a test question
WILLIAMS	7/8/2020	I have no id
WILLIAMS	7/8/2020	Damien Williams
UCA	7/8/2020	What was the question thing u wanted me to put on there?
WILLIAMS	7/8/2020	Question: Who is the number one snow bunny ¹² ? Answer: Heathergingersnap

¹¹ “Bottom bitch” is a common term in the human trafficking subculture used to refer to an experienced human trafficking victim who is trusted and aids the trafficker by managing some of the daily operations within the HTO.

¹² “Snow bunny” is a common term in the human trafficking subculture used to refer to a Caucasian woman engaged in commercial sex.

WILLIAMS	7/8/2020	Really seem like u playing
WILLIAMS	7/8/2020	But dig this. I don't have the time or patience for games
WILLIAMS	7/8/2020	Cuz all i c is a lot of text that have no meaning and full of games
WILLIAMS	7/8/2020	Say....A bih can make her mouth fry ice cream. Im going off wat u do. Fuck wat u say
WILLIAMS	7/8/2020	U talk a good one but ur action sho nothing
WILLIAMS	7/8/2020	Im starting to think ur a lil girl playing on the phone n internet with a grown ass real P
WILLIAMS	7/8/2020	But it don't take 2 days to send any money
WILLIAMS	7/8/2020	I have had a bih that made me sum money but had such a hard time getting it to me

In this exchange, **WILLIAMS** began to express frustration because the UCA had not yet sent him the commercial sex proceeds. **WILLIAMS** again provided instructions for the UCA to transfer the commercial sex proceeds earned on July 6, 2020. **WILLIAMS** again provided the name “*Damien Williams*” with a different test question of “*Who is the number one snow bunny*” with the answer “*Heathergingersnap.*” Throughout July 8, 2020, **WILLIAMS** continued to berate the UCA for not sending the commercial sex proceeds and questioned the UCA’s loyalty.

CONTINUED COMMUNICATIONS BETWEEN WILLIAMS AND UCAs

15. On July 10, 2020, **WILLIAMS** continued to communicate with the UCA.

The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/10/2020	Kandi Lucas
WILLIAMS	7/10/2020	Walmart 2 Walmart or western union
WILLIAMS	7/10/2020	Chattanooga Tennessee 37411
WILLIAMS	7/10/2020	I need the senders name and city n state and senders phone number
WILLIAMS	7/10/2020	Ash...So wats up...I got this lady here damn near hostage so I can go get that bread
UCA	7/10/2020	Yeah I sent it
WILLIAMS	7/10/2020	I need tge senders name, phone number, amount and tcn number
WILLIAMS	7/10/2020	And who sent it and amount
UCA	7/10/2020	it was 650 she used my phone number and I had to use my ride's ID so the name is
WILLIAMS	7/10/2020	Western union or Walmart 2walmart
UCA	7/10/2020	Walmart 2 walmart
WILLIAMS	7/10/2020	Reference number

UCA	7/10/2020	923339200
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WILLIAMS previously explained to the UCA that he did not have an identification document. **WILLIAMS** provided the name “*Kandi Lucas*” to be used when sending the commercial sex proceeds via money transfer service. **WILLIAMS** instructed the UCA to send the proceeds using Walmart to Walmart or Western Union. After the UCA told **WILLIAMS** he/she transferred the proceeds, **WILLIAMS** asked the UCA for a reference number. The UCA provided the unique reference number 923339200 required to receive the transfer.

TRANSFER OF COMMERCIAL SEX PROCEEDS TO WILLIAMS

16. On July 10, 2020, HSI Special Agents transferred six hundred fifty dollars to **WILLIAMS** via Walmart to Walmart. The recipient listed was “*Kandi Lucas, Chattanooga Tennessee.*” **WILLIAMS** sent a text message to the UCA confirming receipt of the commercial sex proceeds.

CONTINUED COMMUNICATION BETWEEN WILLIAMS AND UCA

17. On July 10, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/10/2020	Number no good

UCA	7/10/2020	I sent it to kandy lucas
WILLIAMS	7/10/2020	Kandi lucas
UCA	7/10/2020	I spelled it with a y
WILLIAMS	7/10/2020	No transaction found
UCA	7/10/2020	i went like 5 different places and had to pay all my money in gas and all that
WILLIAMS	7/10/2020	Can u work
WILLIAMS	7/10/2020	U send me all the way to this Walmart and aint a damn thing there
WILLIAMS	7/10/2020	Lil momma wat u get outta playing wit a P?
WILLIAMS	7/10/2020	Ok...Its going thru
WILLIAMS	7/10/2020	The misspelled name held it up
WILLIAMS	7/10/2020	850 to go
UCA	7/10/2020	So the money did come thru ok?
WILLIAMS	7/10/2020	Yes baby
WILLIAMS	7/10/2020	Give me one more day like the other day n ima rent a car n come get u
WILLIAMS	7/10/2020	I do wat i say also so whenever u ready to work to get the rest up let me know

While attempting to retrieve the commercial sex proceeds, **WILLIAMS** continued to communicate with the UCA. The UCA informed **WILLIAMS** that he/she sent the

proceeds to the name “*kandy lucas*” as **WILLIAMS** had previously directed.

WILLIAMS corrected the UCA that the name he provided was spelled, “*Kandi Lucas*”

and that the wire transfer transaction could not be located. The UCA explained to

WILLIAMS that the proceeds **WILLIAMS** previously allowed him/her to keep was

spent traveling to five different locations attempting to transfer the commercial sex

proceeds. **WILLIAMS** immediately followed the UCA’s complaint with, “*Can u*

work.” **WILLIAMS** chastised the UCA for making him travel to pick up the proceeds at

Walmart when there “*aint a damn thing there*” and “*wat u get outta playing with a P?*”

WILLIAMS informed the UCA the wire transfer was going through and the UCA still

had eight hundred fifty dollars left to pay on his one thousand five hundred dollar

choosing fee. The UCA asked for clarification that the commercial sex proceeds were

received by **WILLIAMS**, and he stated, “*Yes baby.*” **WILLIAMS** further encouraged

the UCA that if he/she continued to earn commercial sex proceeds such as those

demonstrated earlier, he would come and pick up the UCA.

CONTINUED COMMUNICATION BETWEEN WILLIAMS AND UCA

18. On or about July 12, 2020, **WILLIAMS** continued to communicate with the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/12/2020	Say babygirl....

WILLIAMS	7/12/2020	If u can work Monday i can have u here this week...One of my old girls came back n i think ima rent an spot thru air bnb for yall
WILLIAMS	7/12/2020	She cool n can turn u on to some or her regulars
WILLIAMS	7/12/2020	That's her...Her name is Mary
UCA	7/12/2020	I can work tomorrow
WILLIAMS	7/12/2020	Wat time u want me to post the ad babygirl
WILLIAMS	7/12/2020	N u stay leaving off the Daddy
UCA	7/12/2020	When r u coming to get me?
WILLIAMS	7/12/2020	The day after u send the remaining bread on that very reasonable fee.

During this exchange, **WILLIAMS** refers to the UCA as “*baby girl*,” and tells the UCA if he/she sells commercial sex on Monday, he can transport the UCA to Chattanooga, Tennessee that same week. **WILLIAMS** informed the UCA that he had another trafficking victim working under his authority and she can introduce her regular commercial sex customers to the UCA. **WILLIAMS** sent the UCA five photographs of his trafficking victim and told the UCA “*Her name is Mary.*” The UCA acknowledged receiving pictures of the victim and told **WILLIAMS** that he/she could work the next day. **WILLIAMS** stated, “*Wat time u want me to post the ad babygirl*” and corrected the UCA for not addressing him as “*Daddy.*” The UCA asked **WILLIAMS** when he planned on coming to pick up the UCA to bring him/her back to Chattanooga, Tennessee.

WILLIAMS replied, “*The day after u send the remaining bread on that very reasonable fee.*”

19. **WILLIAMS** continued to communicate throughout the day of July 12, 2020. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	7/12/2020	Ain't that a long drive tho? U don't mind coming all the way out here?
WILLIAMS	7/12/2020	Can u get on the bus?
WILLIAMS	7/12/2020	Plane?
WILLIAMS	7/12/2020	Train?
UCA	7/12/2020	I don't think I can without an ID
WILLIAMS	7/12/2020	I mean Megabus don't check ID
WILLIAMS	7/12/2020	And greyhound wont either if i buy the ticket online
WILLIAMS	7/12/2020	So just trust me babygirl
WILLIAMS	7/12/2020	Errytime u say something to me it should either start wit daddy or end wit daddy
UCA	7/12/2020	I will daddy
WILLIAMS	7/12/2020	Ok babygirl...Just be ready
WILLIAMS	7/12/2020	Hope u have a great day tomorrow. And u gotta send that bread ASAP

During this exchange, the UCA asked **WILLIAMS** if the distance between Chattanooga, Tennessee and Dallas, Texas would cause a problem with him trafficking the UCA.

WILLIAMS asked the UCA if he/she could not “*get on a bus,*” “*Plane,*” or “*Train.*”

The UCA again reminded **WILLIAMS** about her age and status as a juvenile by telling him that he/she did not possess an identification document. **WILLIAMS** told the UCA

an identification document is not checked when traveling on “*Megabus*” and “*grey*

hound wont either if i buy the ticket online.” **WILLIAMS** told the UCA to “*just trust me*

babygirl” and instructed the UCA again to refer to him as “*daddy.*” **WILLIAMS** told

the UCA to “*just be ready*” and “*have a great day tomorrow*” earning commercial sex

proceeds. **WILLIAMS** ended the conversation by instructing the UCA to send the

commercial sex proceeds he/she earned as soon as possible.

20. **WILLIAMS** continued to communicate with the UCA on July 13, 2020.

The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/13/2020	How my babygirl doing today
UCA	7/13/2020	I’m good my Aunt is getting ready to leave so I’m ready to work when you ready to post it
WILLIAMS	7/13/2020	Send me that number u use
UCA	7/13/2020	214-935-3820

WILLIAMS	7/13/2020	The app acting crazy, Says i cant post in the USA
WILLIAMS	7/13/2020	Im Tryna post the ads...Megapersonal and skip the games is tripping

WILLIAMS initiated communications, calling the UCA *“babygirl.”* The UCA told

WILLIAMS that his/her guardian will be leaving soon and he/she can sell commercial sex whenever **WILLIAMS** is ready to post the commercial sex advertisement.

WILLIAMS asked for the UCA’s phone number that was previously used. He then told the UCA the website he was attempting to use, would not allow him to post the commercial sex ad in the United States of America. **WILLIAMS** further explained to the UCA, *“Im Tryna post the ads...Megapersonal and skip the games is tripping,”*

SECOND POSTING OF A COMMERCIAL SEX ADVERTISEMENT

21. On July 13, 2020, **WILLIAMS** posted a second commercial sex advertisement on the website www.tagged.com. **WILLIAMS** utilized photographs from his previous commercial sex advertisement posted on www.skipthegames.com on July 10, 2020. The advertisement described the UCA as *“19”, “In a Relationship,” “Caucasian/White,” “Catholic,”* and *“Straight.”*

22. **WILLIAMS** continued to communicate with the UCA on July 14, 2020. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/14/2020	Did u get any calls
WILLIAMS	7/14/2020	U did good?
UCA	7/14/2020	I got a couple set up for this afternoon I didn't have time for all the tricks last night
UCA	7/14/2020	Where did u post?
WILLIAMS	7/14/2020	Ancient Chinese secret
WILLIAMS	7/14/2020	Hoe much did u make.
UCA	7/14/2020	500 last night
WILLIAMS	7/14/2020	This what i want u to do. Im gonna get this rental today. But ima need u to send me 400 ASAP u keep 100. We gonna say that's 12. U have to make 300 today that's it...And with them 2 or 3 u have lined up that will be easy

During this exchange, **WILLIAMS** asked the UCA how many responses the UCA received from the commercial sex advertisement posted on July 13, 2020. The UCA told **WILLIAMS** he/she made several arrangements to sell commercial sex after he/she “*didn't have time for all the tricks last night.*” The UCA asked **WILLIAMS** where he posted the commercial sex advertisement and **WILLIAMS** replied, “*Ancient Chinese secret.*” **WILLIAMS** asked the UCA how much he/she earned from selling commercial sex and the UCA stated “*500 last night.*” **WILLIAMS** then instructed the UCA, “*send*

me 400 ASAP u keep 100. U have to make 300 today that's it...And with them 2 or 3 u have lined up that will be easy."

CONTINUED COMMUNICATION BETWEEN WILLIAMS AND UCA
REGARDING TRANSFER OF COMMERCIAL SEX PROCEEDS

23. **WILLIAMS** continued to communicate with the UCA on July 15, 2020.

The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/15/2020	Send that bread n I'm coming to Texas
WILLIAMS	7/15/2020	We gonna work there for a min
WILLIAMS	7/15/2020	Just was seeing when u was gonna try to send that
UCA	7/15/2020	If I send it tomorrow u coming Thursday?
WILLIAMS	7/15/2020	Friday
UCA	7/15/2020	I hope Friday morning my aunt talking about leaving for a trip Friday night and she wants me to go with her
WILLIAMS	7/15/2020	Do u have a lot of stuff?
UCA	7/15/2020	Can I take 3 bags?
WILLIAMS	7/15/2020	Yeah...3 cool...U can take more if u need
UCA	7/15/2020	I only got 3 really I don't have much stuff

WILLIAMS	7/15/2020	That's Aiight...The way you work...U will
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During this exchange, **WILLIAMS** told the UCA that as soon as the commercial sex proceeds were sent to him, he would travel to Texas to retrieve the UCA. **WILLIAMS** informed the UCA that he would be keeping the UCA in Texas for a short amount of time to sell commercial sex under his authority. The UCA asked **WILLIAMS** when he planned on traveling to Texas and **WILLIAMS** replied, "*Friday.*" The UCA acknowledged and informed **WILLIAMS** that his/her guardian was making plans to go on a trip that same day. **WILLIAMS** asked the UCA "*Do u have a lot of stuff?*" and the UCA replied "*Can I take 3 bags?*" **WILLIAMS** gave the UCA his permission and told the UCA "*U can take more if u need.*" The UCA informed **WILLIAMS** that he/she did not have that many possessions, and **WILLIAMS** acknowledged, "*That's aiight...The way you work...U will.*"

SECOND TRANSFER OF COMMERCIAL SEX PROCEEDS

24. On July 16, 2020, **WILLIAMS** and the UCA continued to communicate about the transfer of commercial sex proceeds. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	7/16/2020	What city and zip code do I send it to?
WILLIAMS	7/16/2020	Chattanooga 37411
WILLIAMS	7/16/2020	Wats the total?

UCA	7/16/2020	500
UCA	7/16/2020	763461477
UCA	7/16/2020	That's the reference number
WILLIAMS	7/16/2020	Hey...I got it babygirl

On July 16, 2020, HSI Agents transferred five hundred dollars to **WILLIAMS** via Walmart to Walmart. The recipient of the transfer was "Susan Cocke." The UCA gave **WILLIAMS** the reference number "763461477" with an amount of "500." **WILLIAMS** confirmed he received the commercial sex proceeds when he said, "*Hey...I got it babygirl.*"

25. On July 16, 2020, at approximately 12:45 p.m., **WILLIAMS** communicated with the UCA via a telephone call on an HSI recorded telephone number. The following is a summary of the communications between **WILLIAMS**, utilizing telephone number 678-531-3278, and the UCA utilizing an HSI recorded telephone number. This does not include every word exchanged.

26. **WILLIAMS** told the UCA, "*So I got my guy trying to get the car from Tweedies now it's a little spot that takes cash for the rental.*" **WILLIAMS** told the UCA that after he gets the car its an "*11 hour 24 minute*" drive to get to the UCA. The UCA asked **WILLIAMS** what time he would be arriving to pick up him/her and **WILLIAMS** replied, "*I'm going to drive straight through. When I tell you I'm leaving count eleven and a half hours from right then.*" The UCA told **WILLIAMS** that 5 a.m. would be the

best time for him/her to leave and **WILLIAMS** stated, “*we will do about five or six.*”

“*Ill text you and let you know when he got the car and bringing it to me and from that point on I’m on the road.*”

27. Throughout July 16, 2020, **WILLIAMS** maintained communication with the UCA while he prepared to travel to Dallas, Texas to pick up the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/16/2020	My dude i had getting the car for me his card wasn’t accepted. And tweeties the cash place had no cars. One return in the morning. I have to b the first mf at the lot to get it. Do not get discouraged.
UCA	7/16/2020	so what time am i supposed to be ready to leave?
WILLIAMS	7/16/2020	Icant get a car til tomorrow
WILLIAMS	7/16/2020	Definitely tommorw 8-9
UCA	7/16/2020	ok i hope ur for sure daddy my aunt wants to leave for the beach
WILLIAMS	7/16/2020	U don’t have to hope...U showed n proved so i gotta do the same
UCA	7/16/2020	Ok daddy I will be ready
WILLIAMS	7/16/2020	U better

During this exchange, **WILLIAMS** informed the UCA that he would not be traveling that night to pick up the UCA because there were no vehicles available to rent. **WILLIAMS** explained his intention to be the first customer the next morning at “*tweeties*” to pick up a vehicle and told the UCA to “*not get discouraged.*” **WILLIAMS** told the UCA he would arrive “*definitely tommorw 8-9.*” The UCA informed **WILLIAMS** that his/her guardian was planning on traveling out of town and he/she would be ready. **WILLIAMS** ended the conversation by instructing the UCA, “*U better.*”

28. On July 17, 2020, **WILLIAMS** continued to communicate his intention to travel to Dallas, Texas to pick up the UCA. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
WILLIAMS	7/17/2020	At the rental place now babygirl...Waiting on the return so we can rent it
UCA	7/17/2020	What time u gonna get here daddy?
WILLIAMS	7/17/2020	Cant even get a car.
WILLIAMS	7/17/2020	R u scared to fly
UCA	7/17/2020	I'm not scared but I don't think they let me on without a fake ID
UCA	7/17/2020	I don't think 16 is old enough to get a ticket

WILLIAMS	7/17/2020	The bus u can. I know for sure
UCA	7/17/2020	Yea but you don't have a car?
WILLIAMS	7/17/2020	They want 400 for 2 days
UCA	7/17/2020	I sent u 500 yesterday tho
WILLIAMS	7/17/2020	U right...
WILLIAMS	7/17/2020	U were sending tgat foe a rental?
WILLIAMS	7/17/2020	Or on my fee

During this exchange, **WILLIAMS** informed the UCA that he was unsuccessful in renting a vehicle. **WILLIAMS** asked the UCA “*R u scared to fly.*” The UCA expressed concern that he/she would not be able to fly without a false identification document. The UCA re-emphasize his/her age when he/she said, “*I don't think 16 is old enough to get a ticket.*” **WILLIAMS** acknowledged and informed the UCA that he/she could travel on a bus without an identification document. **WILLIAMS** told the UCA the car rental business wanted “*400 for 2 days.*” The UCA reminded **WILLIAMS** that he previously received five hundred dollars in commercial sex proceeds the day before. **WILLIAMS** acknowledged, “*U right...*” and then asked “*U were sending tgat foe a rental? Or on my fee.*”

29. Continuing July 17, 2020, **WILLIAMS** and the UCA continued to communicate with each other. The following is a summary of the communications and does not include everything said during the exchange.

Participant Name	Date	Message
UCA	7/17/2020	I thought u had a car and girls and everything
WILLIAMS	7/17/2020	Babygirl...Dont for one minute think i dont want u here. But u also gotta work wit me.
WILLIAMS	7/17/2020	Cuz this team i have is really a bunch of bullshit
UCA	7/17/2020	If u dont even have enough money to rent a car how are u gonna teach me about the game?
WILLIAMS	7/17/2020	I have more than enough
WILLIAMS	7/17/2020	U haven't even got that small ass fee up n u questioning me bout shit.
WILLIAMS	7/17/2020	U can have this lil bit of money back
WILLIAMS	7/17/2020	U suppose to sit back n let me do this
UCA	7/17/2020	Ur gonna send the 1400 back?
WILLIAMS	7/17/2020	650 plus 500 dont equal 1400
UCA	7/17/2020	So ur gonna send all that back
WILLIAMS	7/17/2020	That's the best thing to do...I have never let nobody tell me wat to do...And im not bout to start now
WILLIAMS	7/17/2020	Wat name u want to use
UCA	7/17/2020, TX

During this exchange, the UCA began to question **WILLIAMS's** status and previous story that he was the head of a HTO. **WILLIAMS** reassured the UCA of his desire to have the UCA join his HTO and expressed dissatisfaction with his "*team.*" The UCA again questioned **WILLIAMS's** lack of funds and ability to earn proceeds operating an HTO. **WILLIAMS** answered the UCA's concern by stating, "*I have more than enough.*" **WILLIAMS** began chastising the UCA for not being able to earn his required fee in order to join his HTO and told the UCA "*U can have this lil bit of money back.*" **WILLIAMS** corrected the UCA regarding the amount of money he previously received in commercial sex proceeds from him/her. When the UCA asked for verification that **WILLIAMS** was returning the commercial sex proceeds, **WILLIAMS** told the UCA "*I have never let nobody tell me wat to do...And im not bout to start now.*" The UCA provided **WILLIAMS** with a name, city, and zip code to return the commercial sex proceeds.

30. On July 28, 2020, the UCA re-engaged **WILLIAMS** about not returning the commercial sex proceeds. **WILLIAMS** did not respond and has not attempted to communicate with the UCA since July 17, 2020.

CONCLUSION

31. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that between June 20, 2020 and July 28, 2020, in the Dallas Division of the Northern District of Texas and elsewhere, **Damien WILLIAMS**

committed the offense of Attempted Child Sex Trafficking in violation of 18 U.S.C.
§§ 1594(a), 1591(a) & (b)(2).

Respectfully submitted,

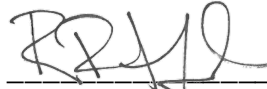


JAMES CUTBIRTH

Special Agent

Homeland Security Investigations

Signature confirmed via reliable electronic means on the 7 th day of August, 2020,
pursuant to Fed. R. Crim. P. 4.1.



HON. REBECCA RUTHERFORD

UNITED STATES MAGISTRATE JUDGE